

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANTOINE KEANE,

CASE NO.: 1:24-cv-6108

Plaintiff,

vs.

EARLY WARNING SERVICES, LLC dba
EARLY WARNING; KEYBANK NATIONAL
ASSOCIATION dba KEYBANK and KEY BANK;
KEYCORP dba KEYBANK and KEY BANK;
FORD MOTOR CREDIT COMPANY LLC dba
FORD CREDIT; TRANS UNION (OF DELAWARE), LLC
dba TRANSUNION

Defendants.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“TransUnion”) hereby removes the subject action from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York, on the following grounds:

THE PARTIES

1. Plaintiff Antoine Keane (“Keane”) is a natural person who resides at 9 W. 31st Street, #PH 1E, New York, NY 10001.
2. Defendant TransUnion is a Delaware corporation with its principal place of business in Illinois.
3. Defendant Early Warning Services, LLC has a business address located at 122 East 42nd Street, 18th Floor, New York, NY 10168.

4. Defendant Keybank National Association has a business address located at 127 Public Square, Cleveland, OH 44114.

5. Defendant KeyCorp has a business address located at 80 State Street, Albany, NY 12207-2543.

6. Defendant Ford Motor Credit Company has a business address located at 28 Liberty Street, New York, NY 10005.

NATURE OF CASE

7. On July 5, 2024, Keane commenced this action in Supreme Court of the State of New York, County of New York, entitled *Antoine Keane v. Early Warning Services, LLC dba Early Warning, et al.*, Docket Number 156169/2024. A true and correct copy of the Complaint is attached hereto as **Exhibit A**.

3. On July 11, 2024, Keane served TransUnion with a Summons with Notice filed in the Supreme Court of the State of New York, County of New York, Docket Number 156169/2024. A true and correct copy of the Summons is attached hereto as **Exhibit B**. No other process, pleadings, or orders have been served on TransUnion.

4. Keane makes claims under and alleges that TransUnion violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). *See* Ex. A.

5. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA, which thus supplies this federal question.

6. Pursuant to 28 U.S.C. § 1441, et seq., this case may be removed from the Supreme Court of the State of New York, County of New York to the United States District

Court for the Southern District of New York. This Court is the proper district court for removal because the State Court Action is pending within this district.

7. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion's receipt of a copy of the Summons with Notice, filed in the Supreme Court of the State of New York, County of New York.

8. All Defendants in this action have consented to removal to the Southern District of New York. Copies of Defendants', Key Corp, Key Bank National and Ford Motor Credit Company, Consent to Removal are attached hereto collectively as **Exhibit C**. Defendant, Early Warning Services, will file its Consent to Removal with the court.

9. Attached hereto as **Exhibit D** is a copy of TransUnion's Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of New York, Docket Number 156169/2024

9. Notice of this Removal will promptly be filed with the Supreme Court of the State of New York, County of New York and served upon all parties.

WHEREFORE, Defendant TransUnion, by counsel, removes the subject action from the Supreme Court of the State of New York, County of New York to this United States District Court, Southern District of New York.

Date: August 12, 2024

BUCHANAN INGERSOLL & ROONEY PC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **12th day of August 2024**. Notice of this filing will be sent to the following via electronic mail.

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